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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$1,537,494.74  
SEIZED FROM CHASE BANK, and

APPROXIMATELY \$2,601.24 SEIZED  
FROM BANK OF AMERICA,

Defendants.

2:21-MC-00199-WBS-JDP

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

It is hereby stipulated by and between the United States of America and potential claimant Ru Cong Ye ("claimant"), by and through their respective counsel, as follows:

1. On or about May 24, 2021, claimants filed a claim in the administrative forfeiture proceeding with the U.S. Customs and Border Protection ("CBP") with respect to the Approximately \$1,537,494.74 seized from Chase Bank and Approximately \$2,601.24 seized from Bank of America (hereafter "defendant assets"), which were seized on August 3, 2020 and August 4, 2020.

2. CBP has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim to the defendant assets as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for

1 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are  
2 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
3 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
4 That deadline was August 22, 2021.

5 4. By Stipulation and Order filed August 23, 2021, the parties stipulated to extend to  
6 September 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
7 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
8 to forfeiture.

9 5. By Stipulation and Order filed September 22, 2021, the parties stipulated to extend to  
10 October 21, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
11 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
12 to forfeiture.

13 6. By Stipulation and Order filed October 21, 2021, the parties stipulated to extend to  
14 November 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
15 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
16 to forfeiture.

17 7. By Stipulation and Order filed November 22, 2021, the parties stipulated to extend to  
18 December 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
19 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
20 to forfeiture.

21 8. By Stipulation and Order filed December 27, 2021, the parties stipulated to extend to  
22 January 11, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
23 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
24 to forfeiture.

25 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
26 February 10, 2022, the time in which the United States is required to file a civil complaint for forfeiture  
27 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
28 to forfeiture.

10. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture shall be extended to February 10, 2022.

Dated: 1/10/2022

PHILLIP A. TALBERT  
United States Attorney


By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

Dated: 1/10/2022

/s/ Seth P. Chazin  
SETH P. CHAZIN  
Attorney for potential claimant  
Ru Cong Ye  
(Signature authorized by phone)

**IT IS SO ORDERED.**

Dated: January 14, 2022

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE